

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

GWENDOLYN P. McQUIRTER, et al.,)
)
Plaintiffs,)
)
v.) Civil Action No.: 2:07-cv-234-MEF
)
CITY OF MONTGOMERY, ALABAMA,)
et al.,)
)
Defendants.)

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on April 27, 2007, participants were:
Jerry M. Blevins for Plaintiffs
Kimberly O. Fehl for Defendants
2. **Pre-discovery Disclosures.** The parties will exchange the information required by Fed.R.Civ.P. 26(a)(1) within 21 days of the Court's Scheduling Conference Order.
3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:
 - A. Discovery will be needed on the following subjects: The allegations of the Complaint and all matters relevant thereto and those defenses asserted by Defendant in its Answer.
 - B. Disclosure or discovery of electronically stored information should be handled as follows: copies of any such information shall be produced as with non-electronically stored information.
 - C. The parties have agreed to an order regarding claims of privilege or of protection as trial-preparation material asserted after production, as follows: All materials to be held strictly confidential unless and until the Court rules otherwise.

- D. All discovery commenced in time to be completed by January 25, 2008.
- E. Maximum of 40 interrogatories by each party to any other party.
- F. Maximum of 40 requests for admission by each party to any other party.
- G. Maximum of 6 depositions by Plaintiff and Defendant.
- H. Each deposition other than of Plaintiffs and Defendant's corporate representative limited to maximum of 6 hours unless extended by agreement of parties.
- I. Reports from retained experts under Rule 26(a)(2) due:
 - from Plaintiffs by November 15, 2007;
 - from Defendant by November 30, 2007.
 - Supplementations under Rule 26(e) due December 6, 2007.

4. Other Items.

- A. The parties do not request a conference with the court before entry of the scheduling order.
- B. The parties request a pretrial conference in January 28, 2008.
- C. Plaintiffs should be allowed until October 15, 2007 to join additional parties and until – October 30, 2007 to amend the pleadings.
- D. Defendant should be allowed until October 30, 2007 to join additional parties and until November 14, 2007 to amend the pleadings.
- E. All potentially dispositive motions should be filed by October 30, 2007.
- F. Settlement cannot be evaluated prior to completion of discovery.
- G. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due
 - from Plaintiff by December 21, 2007;
 - from Defendant by December 21, 2007.

H. Parties should have ten days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

I. The case should be ready for trial by March 3, 2008, and at this time is expected to take approximately 2 days to try.

Date: April 27, 2007.

/s/ Jerry M. Blevins

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